

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DEVI NAMPIAPARAMPIL,

Plaintiff,

-against-

THE NEW YORK CITY CAMPAIGN FINANCE BOARD,
AMY LOPREST, DAVID DUHALDE, HANNAH EGERTON,
FREDERICK SCHAFFER, BETHANY PERSKIE, MATTHEW
SOLLARS, JACLYN WILLIAMS & THE CITY OF NEW YORK

Defendants

**NOTICE OF
NON-COMPLIANCE WITH
SAFE HARBOR NOTICE**

No. 23 Civ. 6391 (ER)

March 21, 2025

Dear Judge Ramos,

Plaintiff Devi Nampiaparampil respectfully notifies the Court that Defendants have failed to take corrective action pursuant to the Rule 11 Safe Harbor Notice served on February 27, 2025. As of March 20, 2025, the twenty-one (21) day window required under Rule 11(c)(2) has elapsed without any withdrawal or correction of the filings identified in the attached Safe Harbor Notice.

This update is procedurally relevant because the record in this case is currently being reviewed by the Judicial Panel on Multidistrict Litigation (MDL No. 3146), and Oral Arguments are scheduled for March 27, 2025 in Charlotte, North Carolina. Presumably, the Panel will be reviewing filings across related jurisdictions before that time. This non-response may impact their analysis of venue and procedural integrity.


Plaintiff reserves the right to seek sanctions under Rule 11 and other applicable provisions of law at a future date.

I affirm this 21st day of March, 2025, under the penalties of perjury under the laws of New York, which may include a fine of imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Devi Nampiaparampil
Devi Nampiaparampil
Pro Se Plaintiff
111 John Street Suite 2509
New York, NY 10038
Cell: 312-523-5935
Email: devichechi@gmail.com

The Court is in receipt of the parties' letters. Ms. Nampiaparampil's letter motion to compel a decision on her motion for recusal is denied. As discussed in the February 20, 2025, conference, and as she requested, this case has been stayed pending a decision by the United States Judicial Panel on Multidistrict Litigation on her motion for consolidation with *Nampiaparampil v. The NYC Department of Sanitation Enforcement Division et al*, No. 24-cv-5606 (E.D.N.Y. 2024). City's responses to any pending motions will not be due until after the stay is lifted. The Clerk of Court is respectfully directed to terminate motions, Docs. 128 and 129.

It is SO ORDERED


Edgardo Ramos, U.S.D.J.
Dated: 3/24/2025
New York, New York